

INSPECTION REPORT

for

RCRA Subtitle C

at

Mid-Atlantic Finishing Corp.

4656 Addison Road

Capitol Heights, MD 20743

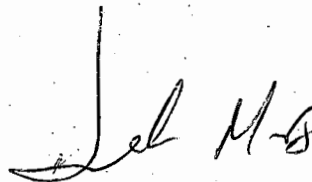
301-322-2233

RCRA Identification Number: MDD985386143

Large Quantity Generator

Inspection Date

July 20, 2011

A handwritten signature in black ink, appearing to read 'Debra M. S.', is positioned above the printed name and title.

Debra Moody

Office of Land Enforcement, 3LC70

Mid-Atlantic Finishing Corp.
Capitol Heights, MD 20743
301-322-2233
July 20, 2011

MDDPar000002865

EPA Inspectors:

Debra Moody, USEPA, Office of Land Enforcement, (215) 814-3294
Kenneth J. Cox, USEPA, Office of Land Enforcement, (215) 814-3441
Stephen Forostiak, USEPA, Office of Land Enforcement, (215) 814-2136

State Representative:

Baruch U. Onyekwelu, MDE, (410) 537-3345

Facility Representative:

B.J. Mason, President, (301-322-2233)
Troy Mason, Vice President
James McCormick, General Manager
John O'Brien, Plant Engineer

Background

The purpose of the inspection was to evaluate Mid-Atlantic Finishing Inc. (the facility) compliance with the Resource Conservation and Recovery Act (RCRA). It was selected for inspection by the Environmental Protection Agency's (EPA) Office of Land Enforcement and put on the FY11 Inspection Plan. The inspection was unannounced and was conducted after notification to the Maryland Department of the Environment (MDE).

Opening Conference

The inspectors entered the facility shortly after 10:45 A.M. and were greeted by B. J. Mason, President of Mid-Atlantic Finishing Corporation. We showed our credentials to B.J. Mason, and gave him a brief overview of why we were at the facility. We informed Mr. Mason that we were waiting on the State inspector from the Maryland Department of the Environment (MDE) who should arrive shortly. Mr. Mason invited us into the trailer (his office) and explained that a year ago there was a fire at the facility and they were in the process of rebuilding part of the facility. Mr. Baruch Onyekwelu from MDE arrived at the facility around 11 a.m., we all introduced ourselves and showed our credentials once again. B.J. Mason gave us a brief overview about the facility while we waited for Mr. Troy Mason, Vice President, James McCormick, General Manager, and Mr. John O'Brien, Environmental Manager. The facility currently has 16 employees and the shifts are 7:00 a.m. to 3:30 pm Monday through Thursday and 7:00 a.m. to 12 noon on Friday. Mr. John Mason, Mr. O'Brien and Mr. McCormick arrived; we identified ourselves, showed our credentials and were told that Mr. McCormick and

Mr. O'Brien would be taking us on the tour of the facility. We all gathered our safety equipments and begun the tour.

All information included in this report is the result of statements by Mr. Mason, direct observations, documents supplied by the facility, and review of EPA file material.

Current Operations

The facility is an electroplater, plating a variety of metals including zinc, cadmium, chromium, gold, silver, tin, tin/zinc, nickel and cooper in addition to chemical conversion coating of metals. All wastewaters generated in the plating processes are treated prior to discharge.

Process and Waste Generation

The plating process generates wastewaters that are contaminated with cyanide and chromium. The cyanide wastewater is treated to destroy the cyanide before being combined with the other wastewaters. The combined flow goes to a treatment tank where the pH is raised to precipitate the metals. The water goes to a settling tank where the metal settle to the bottom and the clarified water is sent to the POTW. The wastewater is continuously monitored as it goes into the POTW. The sludge then goes into the filter press and dewatered any wastewater which is returned to the wastewater treatment unit. The sludge is packaged in one cubic yard woven polypropylene bags for shipment as F006 waste.

Observations:

Quality Control/ Shipping Area

The tour began in the Quality Control and Shipping Area. We had to walk through the Old production area in order to get there. This area is where the final inspection process for every order mandates a visual 10x examination of the finish product before shipment.

Laboratory

The inspector observed in this area two sinks that are connected to the wastewater treatment; one is use for acid base only and the second is sink is used for cyanide. No waste generated in this area.

Plating Process

The customer parts request for the order comes in boxes or bags, hung on hangers and then prep for processing. The order is cleaned, spray rinsed and then dipped into the appropriate plating bath according to the order request. The product is then rinsed once again and placed on racks to

air dry or in oven for drying. All plating process is done by hand. The inspector observed two rows of several plating baths labeled with the contents (photo 4 & 5). The inspector observed five cyanide plating bath located at the end of row. There was a secondary containment grate beneath plating bath tank number 16 that contained an excessive amount of green liquid (see photo #6). Mr. John O'Brien said that the content beneath the grate is removed once a year, that the grate was lined and the liquid was concentrated. The inspector observed the wastewater treatment area where the fluid is processed prior to being pumped into the setting tank and the F006 sludge is settled and pumped to collection area. Mr. O'Brien informed the inspector that the facility only recycles gold, silver and nickel.

Surface Impoundment

Locate in the back of the facility was a surface impoundment that contained several hundred fish. Mr. O'Brien said that the surface impoundment is filled by the rain which run-off into the pond. (See photos 7 – 10)

Old Production Area/ Hazardous Waste Storage Area

In the Old Production Area/Hazardous Waste Storage Area the inspector observed two sacks full of F006 that was labeled and dated. The first sack was dated June, 20, 2011 and the second sack was dated June 27, 2011 (photo 1-3). Mr. O'Brien informed the inspector that a shipment was just recently sent out and that two bags of F006 waste was sent out every 90 days. When asked why there were two different dates, the inspector was told that "that sack bag number two had ripped" and "Mr. Obrien replaced the sack on June 27, 2011". The inspector then asked when are the sacks dated and was informed that the facility date's the sack when the bag is full. The inspector also observed a half full, open sack of F006 that was unlabeled and undated (see photo 11-16). The inspector inquired whether or not weekly inspections were performed at the facility and if a weekly log was kept. The inspector was informed that weekly inspections were not performed although someone walks by the area everyday and no weekly log was maintained.

In the back of the Old Production Area the inspector observed two tubs of sludge collection from the filter press, both half full. Mr. O'Brien informed the inspector that the collection of sludge is removed at the end of each shift into the sacks.

Universal Waste

As we entered the back of the Old Production Area, the inspector observed that florescent light bulbs were being used for lighting in this area. The inspector asked Mr. O'Brien "what do you do with your old light bulbs"? Mr. O'Brien stated that they throw the old bulbs in the trash can.

Records Review

After the tour of the facility, we went back to B.J. Mason office where the inspector requested the following documents: Hazardous Waste Inspection Log; Emergency Response Plan; Contingency Plan; Training Records; Hazardous Waste Inspection Log; and Manifest Records.

MANIFESTS – Manifests records for the past five years were review for completeness and to determine the facility's generation rate. All the manifests were fully signed and had appropriate LDR forms. There were a discussion between B.J. Mason, EPA inspectors and Mr. Onyekwelu whether or not the facility was considered a SQG vs LQG under MDE Regulations based on the amount of F006 waste generated and the weight of the sack. Mr. Onyekwelu, MDE inspector was to do further investigation and report back to the facility and EPA. Mr. Troy Mason provided documentation to EPA and MDE on July 21, 2011 of the facility actual weight of shipment of F006 waste for FY2010. The facility shipped on 4/1/10 2,889 lbs which consisted of two bags of F006 waste and on 9/16/10 3,042 lb which consisted of two bags of F006 waste (See Attachment B).

TRAINING – Job titles and job description for personnel who manage hazardous waste at the facility was not provided to the inspector at the time of the inspection. Mr. O'Brien informed us that all training for the facility was handled by American Compliance Environmental Consultant. American Compliance Environmental was at the facility on June 30, 2011 to provide Safety Training. Training records were reviewed for 2011, 2010, 2009 and 2008. All training records reviewed appeared to be complete but was in accordance with the OSHA training regulations.

CONTINGENCY PLAN – The facility did not have a contingency plan at the facility at the time of the inspection. Mr. Mason was to check with MDE whether or not a contingency plan was required. On July 21, 2011, EPA received a Contingency Plan for the Facility dated February 11, 2008 (See Attachment C). Emergency contact information was posted within the main office and on the front door of the main building (See Attachment D).

Weekly Logs – The facility was not performing weekly inspections of the Hazardous Waste storage area and was not maintaining an inspection log. EPA received a copy of an inspection log sheet submitted by the facility on July 21, 2011(See Attachment E).

Exit Conference:

A brief exit conference was held with B.J. Mason, John O'Brien, Troy Mason, and James McCormick at the conclusion of the file review. Areas of concern discussed are listed below. There were also some concern and confusion regarding the Maryland regulations whether or not the facility was consider a SQG or LQG based on the F006 sludge shipment manifest and the 180 day storage time frame. There were questions on the weight of the sack once it was full with the F006 sludge. Mr. B.J. Mason was going to find out the exact weight of a sack and provide EPA and MDE with a report based on the last 12 months to determine if the facility is SQG or LQG.

Areas of Concern:

1. Facility did not have a Contingency Plan on site. **(State Violation)**.
2. One bag of F006 Waste was open, not dated and not labeled.
3. Bags of F006 should be dated when first entry of hazardous waste is placed in it.
4. Training – all OSHA training, not RCRA requirement training.
5. No job description or job responsibilities.
6. Universal Waste Light Bulb was being placed in trash cans.
7. Facility will get report based on last twelve months to determine LQG vs SQG.
8. No weekly inspection or log records for Hazardous Waste storage area **(State Violation)**.
9. Storing Hazardous Waste greater than 90 days **(State violation)**.

ATTACHMENT:

Attachment A - Photo Log

Attachment A - Photo Log

**Mid-Atlantic Finishing Corp.
July 20, 2011**



PHOTO #1 - Two hazardous waste labeled containers located in the old production area.



PHOTO #2 - Close up picture of hazardous waste label on 1st container in picture #1.

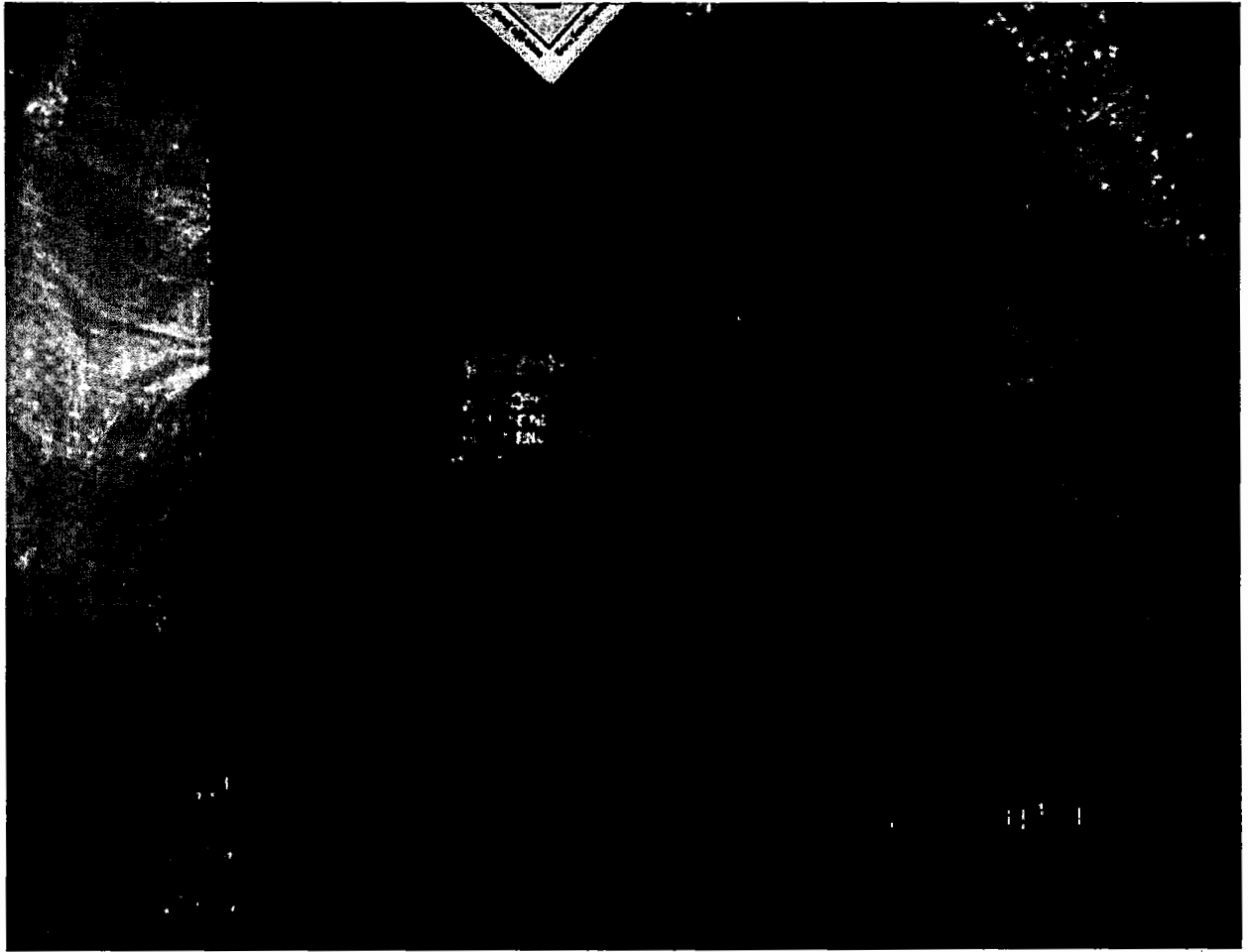


PHOTO #3 - Close up picture of hazardous waste label on 2nd container in photo #1.



PHOT #4 - Plating Bath Area.

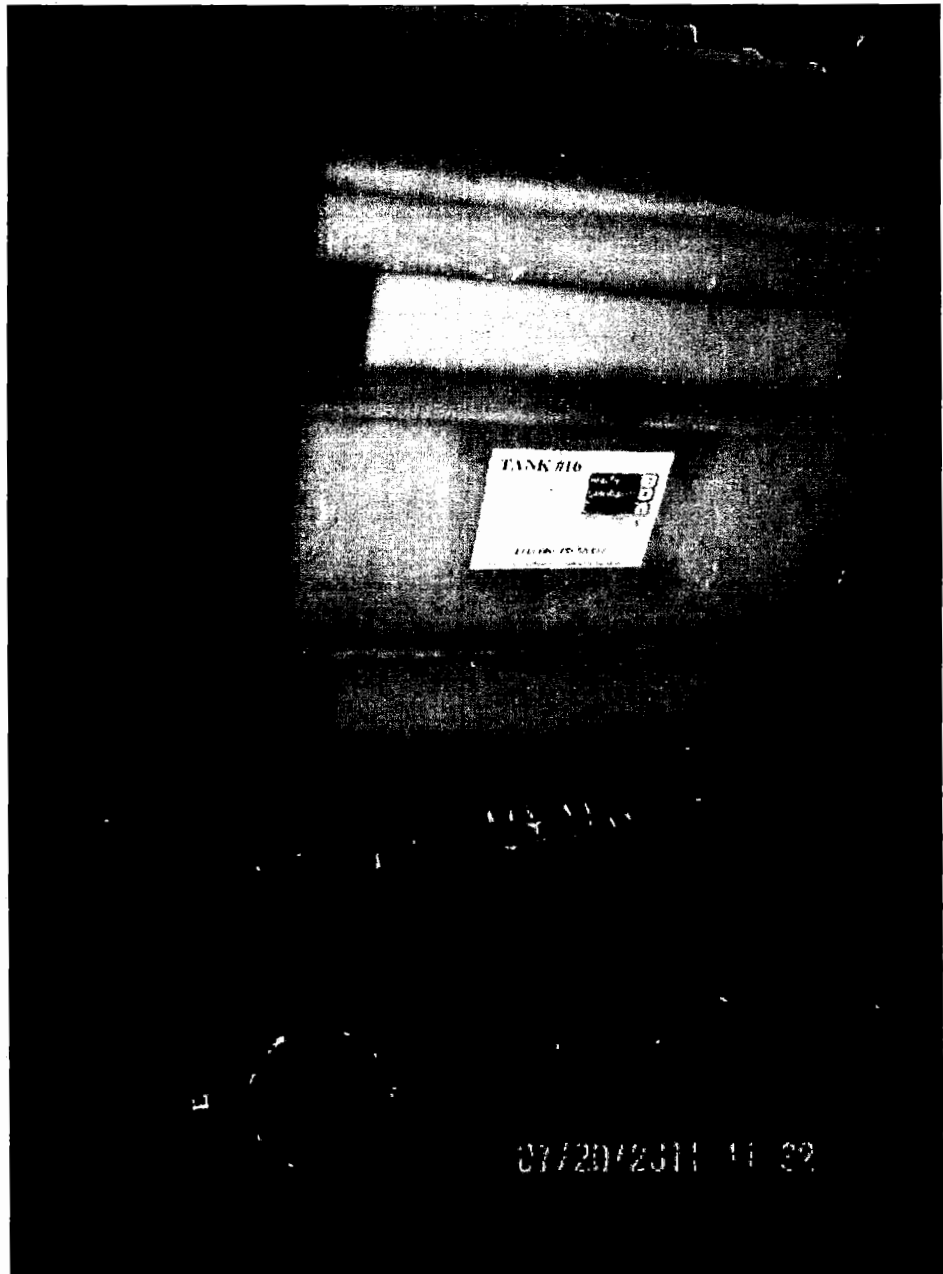


PHOTO #5 - Plating Bath Tank Number 16.

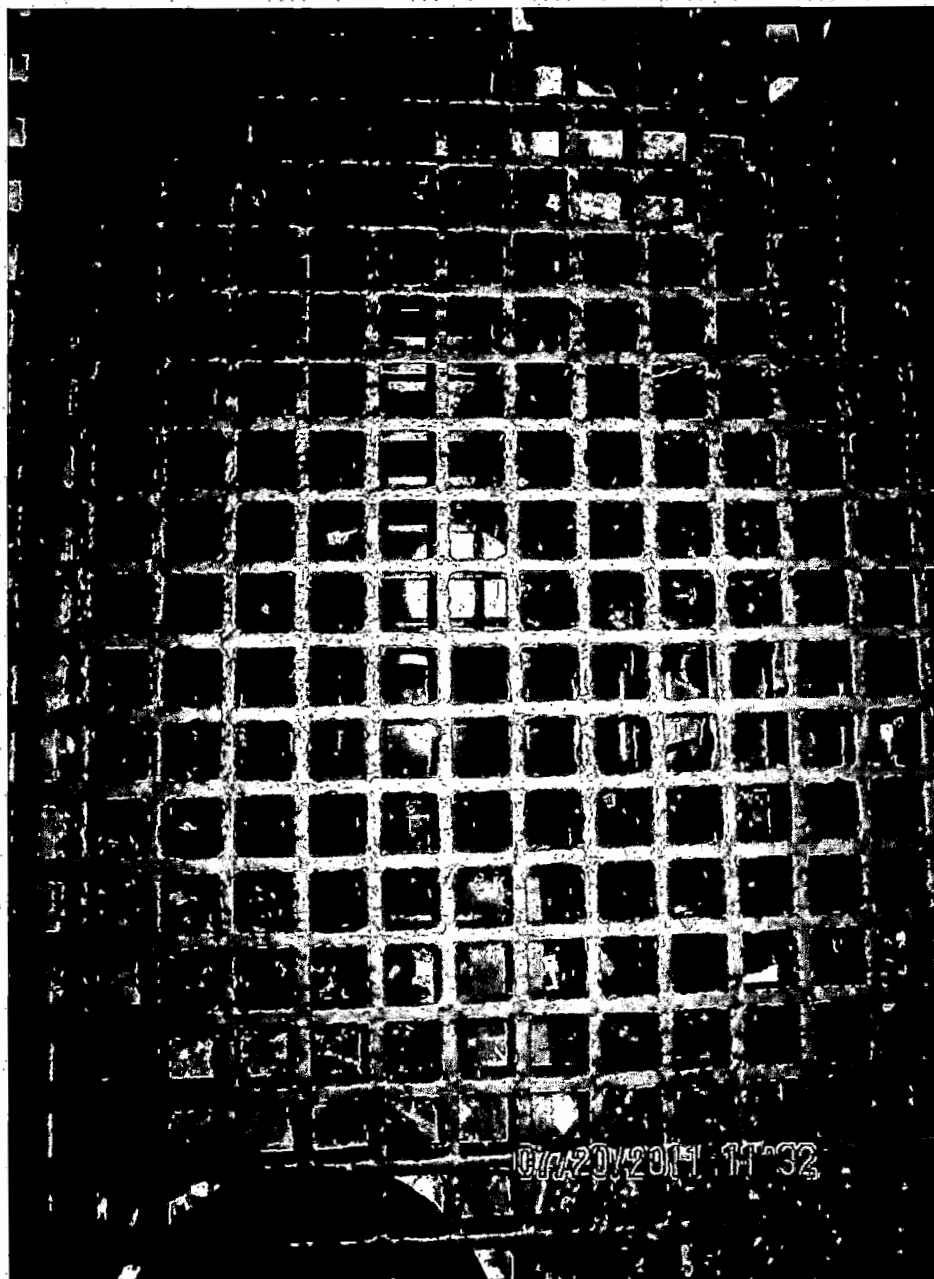


PHOTO #6 - SECONDARY CONTAINMENT WITH EXCESS LIQUID - Grating Beneath
Plating Bath Tank Number 16.



PHOTO #7 - Retention Bond.

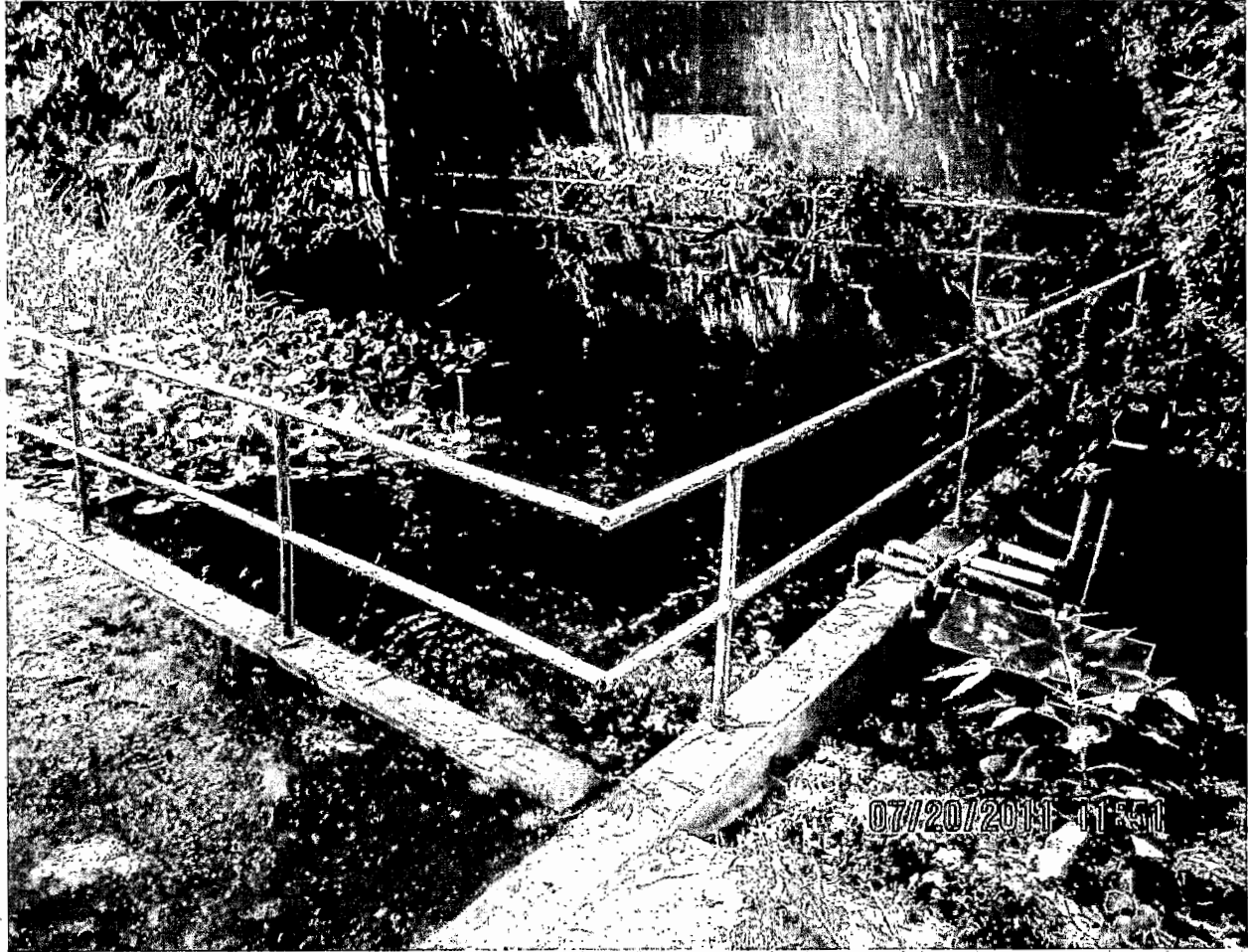


PHOTO #8 - Retention Pond.

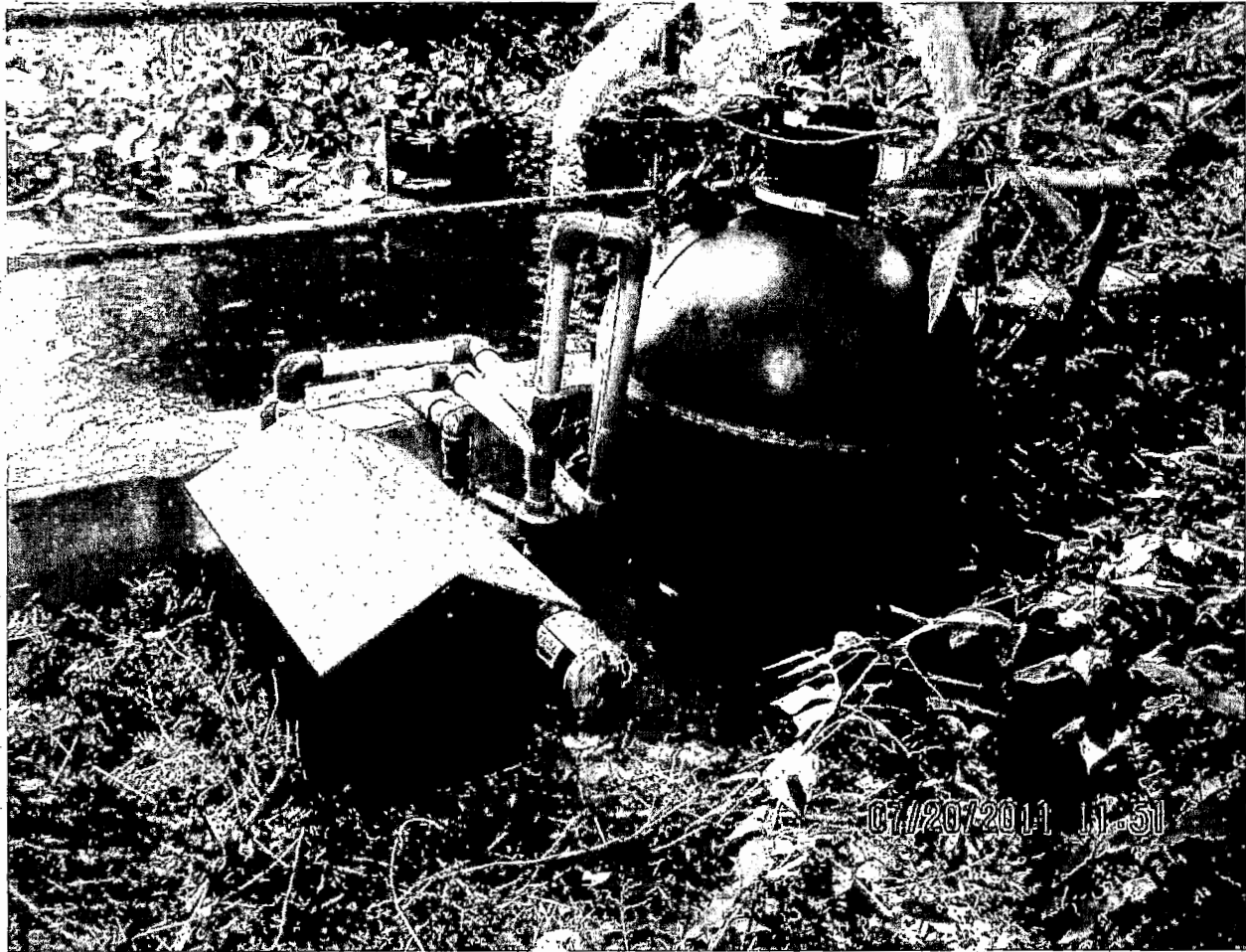
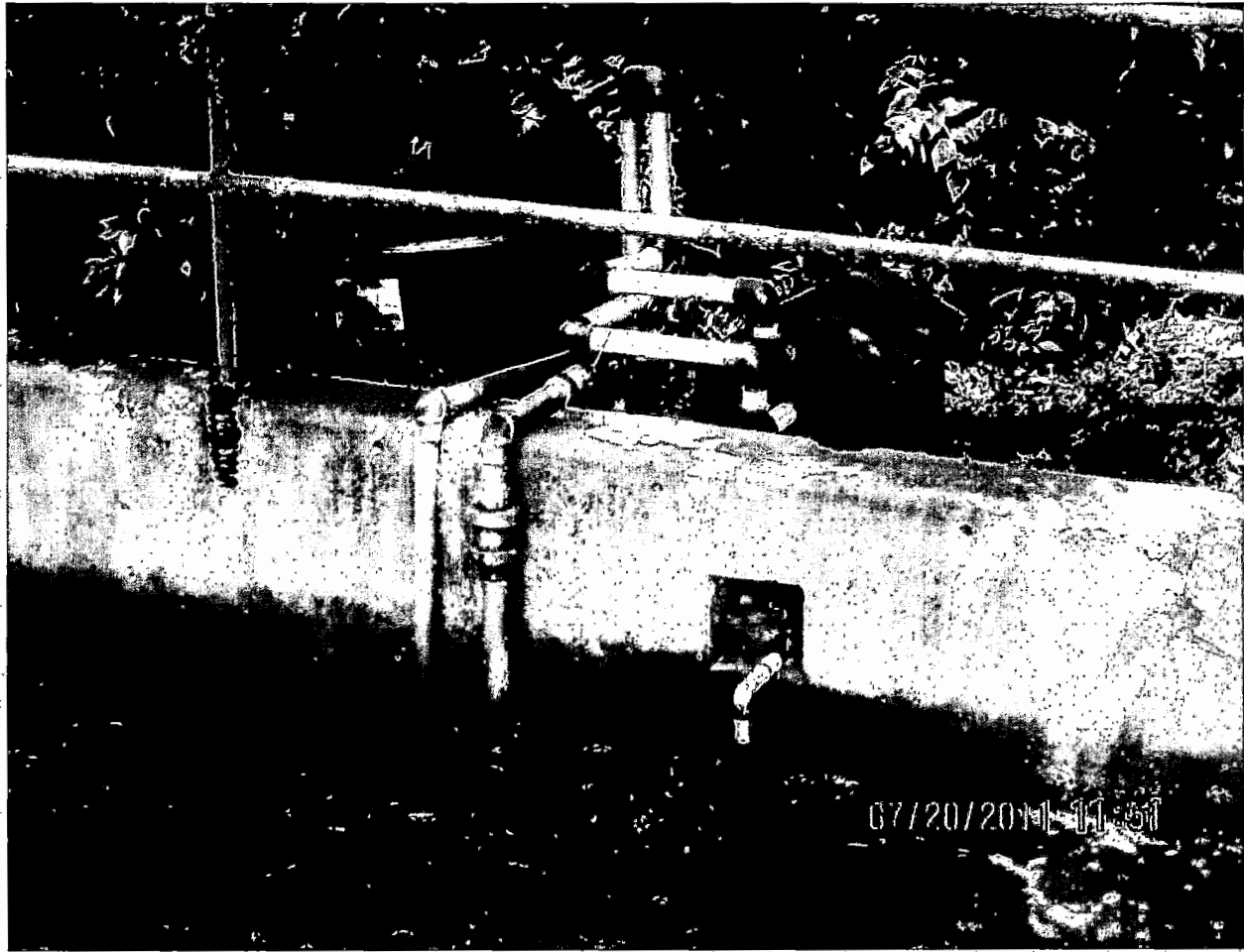


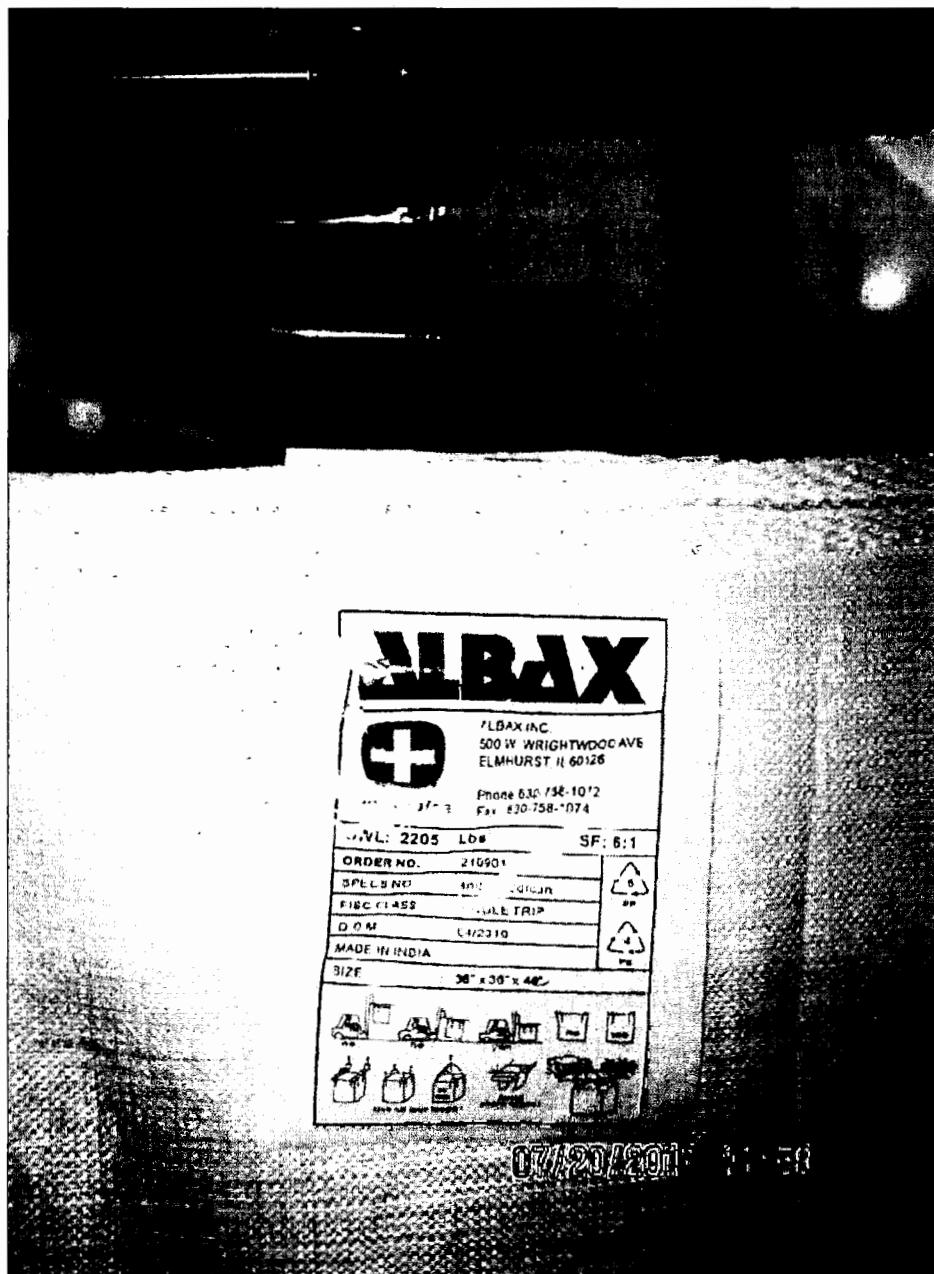
PHOTO #9 - Retention Pond Filtration System.



PHOT #10 - Retention Pond Filtration System Piping and Compressor Exhaust Pipe.



PHOTO #11 - CUBIC YARD CONTAINER WITH F006 HAZARDOUS WASTE NOT LABELED.



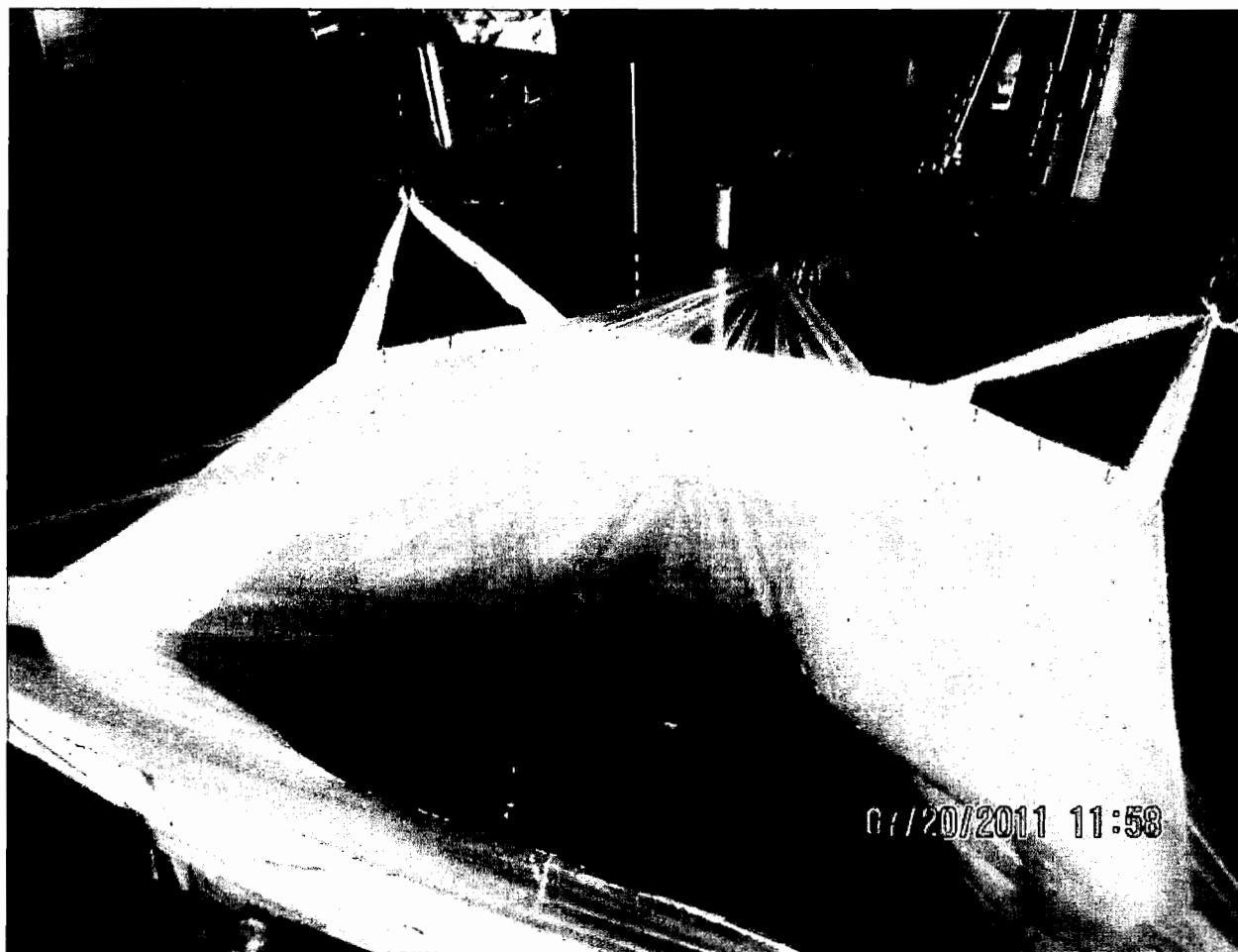


PHOTO #13 - TOP VIEW OF CUBIC YARD CONTAINER WITH F006 HAZARDOUS WASTE WITHOUT A LABEL.



PHOTO #14 - SIDE VIEW OF CUBIC YARD CONTAINER WITH F006 HAZARDOUS WASTE.

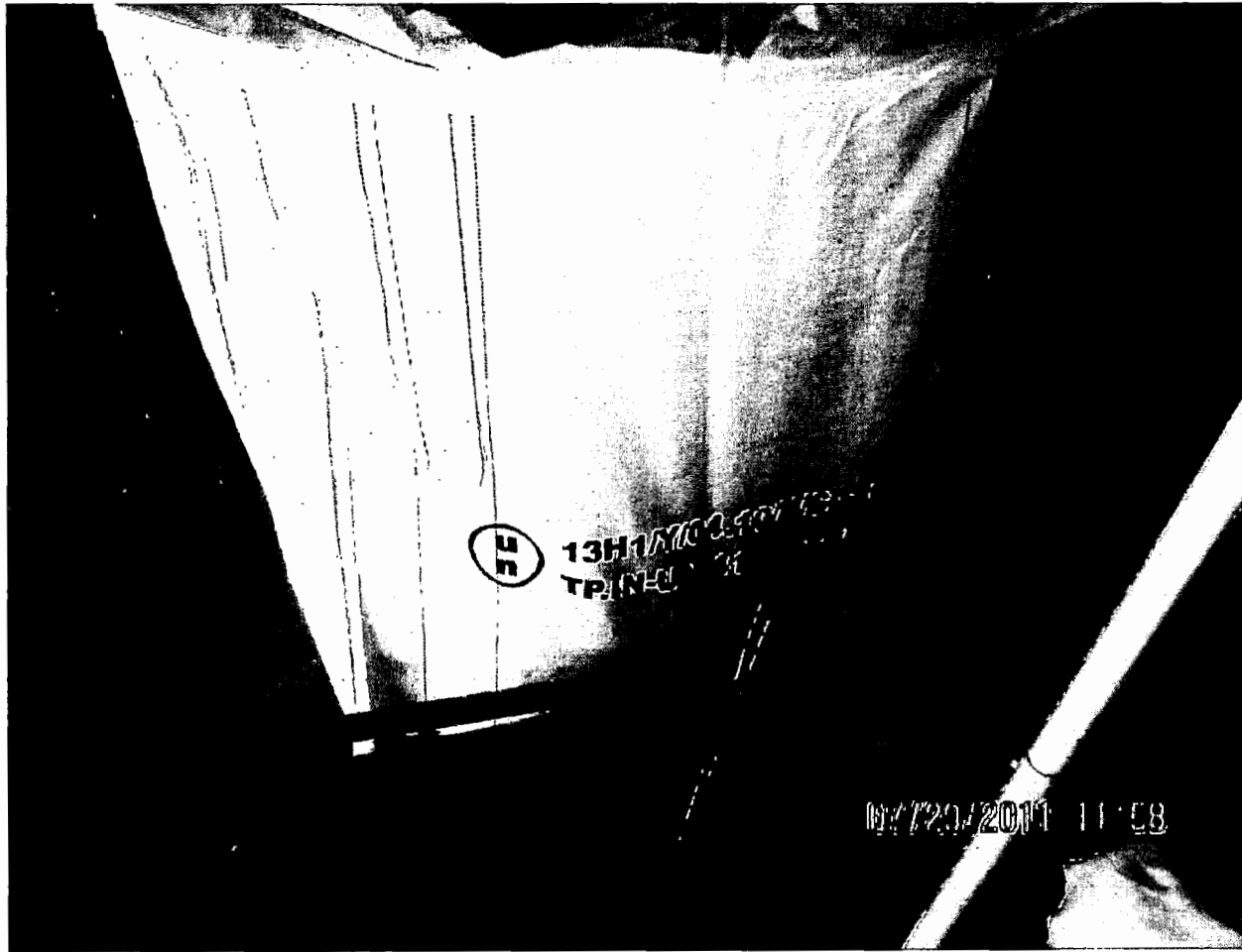


PHOTO #15 - BACK VIEW OF CUBIC YARD CONTAINER WITH F006 HAZARDOUS WASTE.



PHOTO #16 - SIDE VIEW OF CUBIC YARD CONTAINER WITH F006 HAZARDOUS WASTE.



PHOTO #17 - SLUDGE COLLECTION FROM FILTER PRESS NUMBER 1, NOT A SAA, SINCE SLUDGE IS REMOVED AT THE END OF EACH SHIFT.

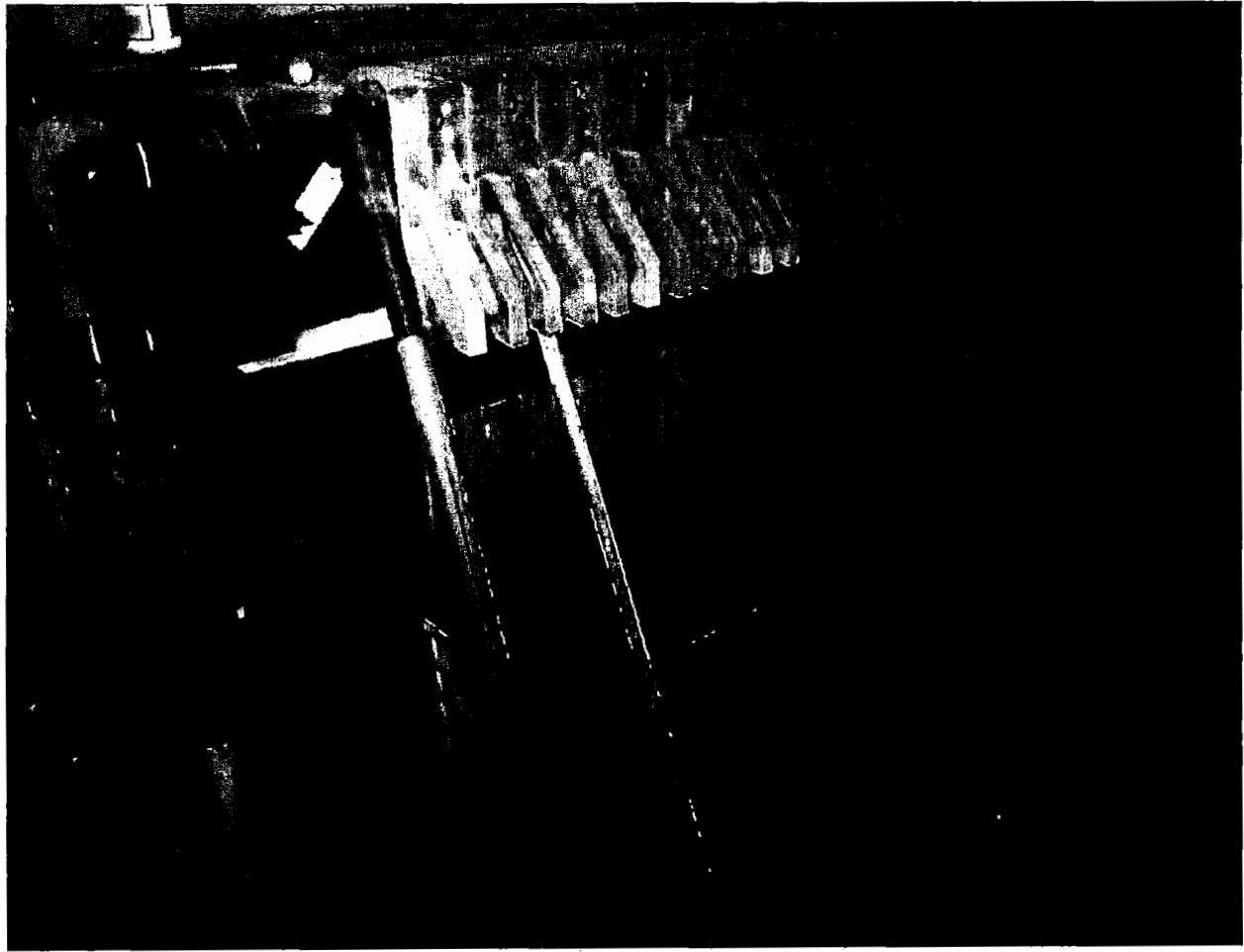


PHOTO #18 - SLUDGE COLLECTION FROM FILTER PRESS NUMBER 2, NOT A SAA, SINCE SLUDGE IS REMOVED AT THE END OF EACH SHIFT.

ATTACHMENT:

Attachment B – Correspondence from Mr. Troy Mason regarding actual weight of shipment of F006 for FY2010.

Attachment B

**Mid-Atlantic Finishing Corp.
July 20, 2011**



VISIT AT MID-ATLANTIC FINISHING CORP 7/20/2011

Troy Mason

to:

Debbie Moody, bonyekwelu

07/21/2011 02:28 PM

Cc:

Stephen Forostiak, Ken Cox, "Kishor Parikh", "BJ Mason", "John O'brien"

Hide Details

From: "Troy Mason" <troy@maf.com> Sort List...

To: Debbie Moody/R3/USEPA/US@EPA, <bonyekwelu@mde.state.md.us>

Cc: Stephen Forostiak/R3/USEPA/US@EPA, Ken Cox/R3/USEPA/US@EPA, "Kishor Parikh" <kishor@maf.com>, "BJ Mason" <bj@maf.com>, "John O'brien" <john@maf.com>

1 Attachment



img-MID-TALANTIC FINISHING CORP..pdf

Baruch / Debra,

Per our meeting yesterday (7/20/2011) regarding weather we fall under the category of small or large generator of f006.

Calendar year 2010 we shipped a monthly average of less than 500lbs.

Please give us feedback regarding this e-mail as we feel this puts us in the small generator category.

Please see the attached information from World Resources Company.

Regards,

Troy Mason

Troy Mason

VP/Sales

Mid-Atlantic Finishing Corp.

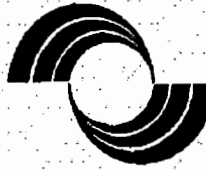
Phone# 301-322-2233 ext.205

Fax# 301-772-6786

Blackberry- 301-385-2469

 cid:image002.jpg@

<http://www.maf.com>



WORLD RESOURCES COMPANY

POTTSVILLE, PENNSYLVANIA

Telefax Transmittal Sheet

To: John O'Brien

From: Cheryl J. Misstishin

Total Pages
(including this page)Co: Mid-Atlantic

World Resources Company

170 Walnut Lane, Pottsville, PA 17901-8559

Fax: 301-773-5841

Fax: (570) 622-6116

Date: 7-20-11

Phone: (570) 622-4747 Ext. 1218

3*Hi John,**Per your request.**Let me know if cannot read
the information.**Thanks,**Cheryl*

ISO 9001, ISO 14001 and OHSAS 18001 Certified Recycling Facility

PI NUMBER:

GENERATOR NAME:

OF CONTAINERS:

NXX

MATR'L GROSS WT.

PALLET WEIGHT

(40 lbs. Each)

CONTAINER WEIGHT

(Steel DM 40 lbs. Each)

(Plastic DM 25 lbs. Each)

Specific Tote Weights Check Sheet

(Boxes CF/BX 35 lbs. Each)

(Caged Totes 110 lbs. Each)

TOTAL DEDUCTIONS

ACTUAL WEIGHT

07-10-10

04/01/2010

07-10-10

04/01/2010

07-10-10

WEIGHT OPERATORS SIGNATURE

FOREMAN'S SIGNATURE

04/01/2010

PI NUMBER:

GENERATOR NAME:

OF CONTAINERS:

WAX

MATR'L GROSS WT.

PALLET WEIGHT
(40 lbs. Each)

CONTAINER WEIGHT

(Steel DM 40 lbs. Each)

(Plastic DM 25 lbs. Each)

Specific Tote Weights Check Sheet

(Boxes CF/BX 35 lbs. Each)

(Caged Totes 110 lbs. Each)

TOTAL DEDUCTIONS

ACTUAL WEIGHT

01-11-60 200110

01-11-60 200110

01 5291

on 09/16/2010

WEIGHT OPERATORS SIGNATURE

FOREMAN'S SIGNATURE

ATTACHMENT:

Attachment C – Contingency Plan dated 2/11/08 from Mr. Troy Mason on 7/21/11.

Attachment C

**Mid-Atlantic Finishing Corp.
July 20, 2011**

RCRAInfo CM&E EVALUATION - VIOLATION FORM

*EPA ID Number	MDD985386143			EIN	
Handler Name	Mid-Atlantic Finishing, Inc.				
Street	4655 Addison Rd				
City	Capitol Heights	State	MD	Zip Code	20743
Actual Generator Status <i>Check only if different from Notified Status.</i>		LQG <input checked="" type="checkbox"/>	SQG <input type="checkbox"/>	CESQG <input type="checkbox"/>	Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>
Universe Change Required? (Generator Status Change Required)		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	If YES, complete the Universe Change Section (on reverse side of this form).	
RCRA Non-Notifier?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	If YES, complete the Handler Section (on reverse side of this form).	
Other Facility Information Changes?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	If YES, complete the Handler Section (on reverse side of this form).	
*EVALUATION		<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Update	<input type="checkbox"/> Delete	You must provide an Evaluation Identifier (also known as the Sequence Number).

*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization
001	CEI	2/2/08	S	HALS	

You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.

Reclassified SV Date:
Only applicable for SNN evaluation type as appropriate.

Notes:

Submitted Contingency Plan & MDE

Evaluation Indicator Field (Check all that apply)

☐ Citizen Complaint ☐ Multimedia Inspection ☐ Sampling ☐ Not Subtitle C

Focused Coverage Areas (Use Only for Evaluation Type FCI)

Regulation-Specific FCI

BIF ☐ CCI ☐ CFI ☐ INC ☐ LDR ☐ PTB ☐ PTX ☐
 THI ☐ UIC ☐ UOI ☐ UWR ☐ OTHER (specify): _____

Routine/Standardized FCI

CAR ☐ CPC ☒ DOS ☐ EMR ☐ IEI ☐ ISI ☐ RTI ☐

Does this Evaluation Add/Update/Delete a Violation?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in the Violations Section(s) on page 2 of this form.
Does this Evaluation link to a Commitment?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.
Does this Evaluation link to a 3007 Request?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below.

*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)	*Date Determined (mm/dd/yyyy)
	N/A		N/A	N/A

*Required Fields

EPA ID Number				Handler Name			
MD0985386143				Mid-Atlantic Facility, Inc			
VIOLATIONS SECTION							
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)		
4	4	S	01/09/2008	<input checked="" type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	02/02/2008		
Notes: 264D Facility in compliance							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)		
				<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.			
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name				Contact			
Street							
City		State		Zip Code			
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
I. Indicate the Facility's current Universe(s):							
II. Indicate the new RCRAInfo Generator Universe: Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
III. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)				Transporter <input type="checkbox"/> If the transporter box is checked, you must check at least one mode of transportation below: <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields



Maryland Department of Environment
Waste Management Administration
Hazardous Waste Program
1800 Washington Blvd, Baltimore MD 21230
(410) 537-3400

TEMPO Agency Interest ID #: 6275

RCRA ID #: MDD985386143
Facility Name: Mid-Atlantic Finishing Inc
Address: 4656 Addison Rd
City: Capitol Heights
County: Prince George's

Generator Status: LQG

State: MD **Zip:** 20743

Site Contact: B. J. Mason
Title: Owner and Operator

Phone #: (301) 322-2233

Inspection Type: CEI
Inspection Start Date: January 9, 2008
End Date: January 9, 2008

Activity #: CFI20080001
Time: 12:00 AM
Time: 12:00 AM

Department Lead Inspector: Anthony Enweze

Documentation

- | | |
|---|--|
| <input checked="" type="checkbox"/> Photos/Videos taken | <input type="checkbox"/> Other documentation |
| <input type="checkbox"/> Documents obtained from facility | <input type="checkbox"/> Request for submission of documents |
| <input type="checkbox"/> Samples taken by outside source | <input type="checkbox"/> Samples taken by the Department |

Checklist:

☒ Generator

☐ TSD Facility

Inspection Report

On January 9, 2008, I arrived at the above named facility to conduct Compliance Evaluation Inspection (CEI). I met Mr. B. J. Mason and we held a pre-inspection conference with two of the facility staff, Mr. Kishor Parikh, Chemist and Mr. John O'Brien, Plant Engineer. After I made a brief introduction, Mr. Mason gave me details on the facility, saying that the facility commenced operation since 1976 and operates with about 30 employees. The facility occupies 9,000 square feet of space and generates hazardous waste from electroplating and conversion coating processes. The company hazardous waste stream is a primarily metal contaminated solid from compressed sludge produced from wastewater treatment process. Quality laboratory is operational within the facility. According to Mr. Parikh, all remnants from samples used in the laboratory are returned to source of collection after testing.

After the meeting, I reviewed the manifest for completeness and compliance to COMAR requirements. I requested for the Contingency Plan and Mr. Mason stated that the facility never had such a plan and committed to immediately take corrective measures to the effect. Employee training record was reviewed and found to be in compliance.

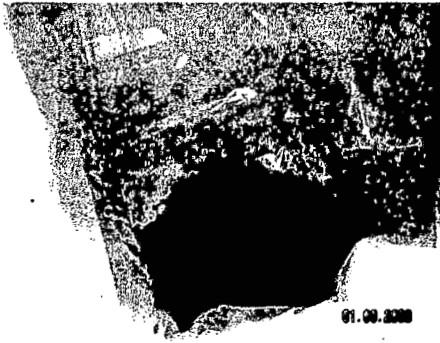
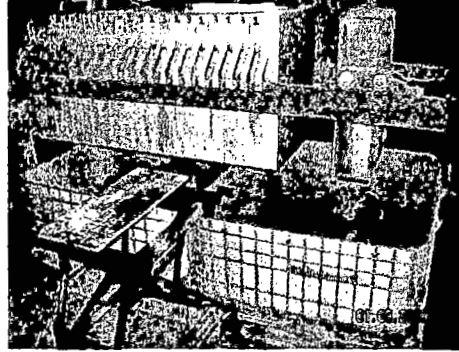
Following document review, I commenced a walk-through of the facility with Mr. Parikh and Mr. O'Brien. There were no violations observed during the walk-through inspection. Hazardous Waste determination results was obtained and attached with this report.

Violation

- The facility has no Contingency Plan for its operations, in violation of COMAR 26.13.05.04A

Action

Mr. Mason was instructed to immediately produce a Contingency Plan and submit copy to MDE.

Hazardous Waste Sludge**Solid/Water Separation in Sludge****Quality Control Lab.****Electroplating process line****Hazardous Waste Solid****Submitted Contingency Plan**

Mid-Atlantic Finishing submitted to MDE a copy of the facility Contingency Plan on February 2, 2008, item missing of on January 9th, 2008 at the time of MDE Compliance Evaluation Inspection. Based on the submission, MDE considers Mid-Atlantic Finishing in full compliance of COMAR requirements based on inspection observations. Herewith is attached, a copy of the facility Contingency Plan for the file.

Submitted 2/11/08

Mid-Atlantic Finishing

Contingency Plan

for

Hazardous Materials/Hazardous Waste Release

Manufacturing Address

4656 Addison Road
Capital Heights, MD 20743

Facility Phone Number

301-322-2233

Mid-Atlantic Finishing Emergency Coordinators

Name	Title	Facility Phone #	Cell Phone #
John O'Brien	Facility Engineer	301-322-2233	301-538-0758
Jim McCormick	General Manager	301-322-2233	301-919-0573
Troy Mason	Vice President	301-322-2233	301-385-2469
B.J. Mason	President	301-322-2233	240-381-5201
Kishor Parikh	Chemist	301-322-2233	301-906-3785

All 24 Hour Emergency Contacts**Emergency Response Information**

FIRE/POLICE/EMS	911
P.G. County Fire Department	301-883-7182
State Emergency Response Commission	410-631-3000
National Response Center	800-424-8802
E.P.A. - Region IV, Title III Unit	404-347-1033
Chemtrec	800-424-9300
WSSC Water	301-206-8594
Maryland OSH	410-333-4197
Spill Response; Tri-County	800-746-4850
MISS Utility	800-257-7777

Registration

I.D. # - MDD985386143
S.I.C. - 3471
N.A.I.C.S. - 332813

Purpose

This plan has been drafted with our primary goal to be setting up the procedures and safeguards to prevent an incidental spill, leak or release of a hazardous materials/waste. Subsequent to this we then clearly outlined procedures for the immediate response to any hazardous material/waste spill.

Description of Hazardous Materials/Hazardous Waste Activities

After receiving parts for plating, we check them. Parts are being racked, cleaned in various cleaning chemical baths. These cleaned parts are continued to be plated in to different plating solution baths as per customer's specification. After plating process, parts are to be dried, inspected, packed and shipped to customers. The list of chemicals is attached.

List of current main (active) chemicals	List of current main (active) chemicals
CHEMICAL NAME (COMMON)	CHEMICAL NAME (COMMON)
ALODINE 1200 S	POTASSIUM CYANIDE
BROCO 50-L-3	POTASSIUM SILVER CYANIDE
BROCO 893 M	ROCHELLE SALT
C-75	SIRPREP 709ZN
CAUSTIC SODA (LIQUID)	SODIUM HYPOCHLORITE (BLEACH)
COPPER CYANIDE	SODIUM META BISULFITE
COPPER SULFATE SOLN.	STARGLO ANTIOX
DEOXIDE D	STARGLO LEAD METHANE SULFONATE
DEOX NC-9	STARGLO STANNOUS METHANE SULFONATE
EN PROX 702	STANNOUS SULFATE
ENVIROCLEAN 120	SULFURIC ACID
GL-826	TCP-HF
HASA2 (ANTI FOAM)	TASKLEEN SE-1R
HYDROCHLORIC ACID	ZENITH EF-9 AM, and ZENITH EF-12 AM
METHANE SULFONIC ACID	ZENITH EF-9 BM, and ZENITH EF-12 BM
NICKEL CHLORIDE SOLN.	ZENITH EF-9 CMA, and ZENITH EF-12 CMP
NICKEL SULFAMATE	EFN-AC SULFAMIC ACID
NITRIC ACID	1025 R REPLANISHER
POLYMER GL-90	

Emergency Plan

When to evacuate:

Any spill larger than an incidental spill would activate the contingency plan immediately. A large hazardous spill that results in fire/explosion, injury or one that escapes containment would require immediate evacuation and initiation of the contingency plan. (This is an extension of our emergency action plans in place for most emergency situations.)

Signals to evacuate

The Building fire alarm system would act as the initial alarm to signal building evacuation and would further reinforced by the emergency action plan that reiterates the evacuation and allows for accountability of employees.

Incident Control

Implementation

The Contingency plan shall be enacted in the event of a large spill or leak, a fire/explosion incident, or serious injury involving a hazardous chemical. Since there is no chemical response team on site any spill larger than a small one would require outside assistance.

Chemical Spills

I. Small/Minor Spill

- a. A spill of this type will be considered a spill that one or two employees could safely handle with resources available on site to remediate. This would also mean that no apparent fire/explosion hazards exist, and that no injury or threat thereof is imminent. As an example we would consider a gallon of any substance to be the largest we would attempt to remediate. The volatility of the chemical, exposures to health and environment, and other factors should be considered while assessing the clean-up effort.
- b. Once a spill of this nature has occurred the following steps are to be taken:
 - i. Alert all employees in spill and nearby areas
 - ii. Notify immediate supervisor
 - iii. Attend to any injuries with decontamination and appropriate first aid.
 - iv. Use proper PPE, secure area and contain spill
 - v. Remove product from area in approve manner
 - vi. Clean area

II. Large/Major Spill

- a. All spills that are not in the category above are designated as large or major spills. The spill may not be large in size but when extenuating circumstances are added it may become a major spill/issue.
- b. For a spill of this type the following steps are to be taken;
 - i. Evacuate immediately; ensure initiation of contingency plan
 - ii. Notification of management and outside agencies (emergency or otherwise)
 - iii. Aid any person injured or exposed with appropriate decontamination and first aid.
 - iv. Secure area to prevent entry. Maintain safe distances as required.

Program Monitoring

Training

In an attempt to eliminate spills training of employees will be trained for the following in their own respects, as well as their relation to this plan:

- I. Emergency action and response for all hazards
 - a. Including Hazardous Materials/Hazardous Waste Spills and Procedures
- II. Employee protection and personal protective equipment
- III. Hazard Communication and Materials Safety Data Sheets
- IV. Lockout/Tagout Procedures
- V. Forklift Safety and Operations
- VI. Function specific training in regard to their assigned tasks
- VII. Respirator use and fit testing

Materials Handling

Storage is decided for materials based on recommendations and use. We consider areas for enclosure or open, security measures, exposures to damage or spill and accessibility. The areas and materials in question are inspected and monitored to ensure safety and compliance in an effort to eliminate these dangers, but are in place to quickly deal with them for a favorable outcome.

Submitted 2/11/08

Mid-Atlantic Finishing

Contingency Plan

for

Hazardous Materials/Hazardous Waste Release

Manufacturing Address

4656 Addison Road
Capital Heights, MD 20743

Facility Phone Number

301-322-2233

Mid-Atlantic Finishing Emergency Coordinators

Name	Title	Facility Phone #	Cell Phone #
John O'Brien	Facility Engineer	301-322-2233	301-538-0758
Jim McCormick	General Manager	301-322-2233	301-919-0573
Troy Mason	Vice President	301-322-2233	301-385-2469
B.J. Mason	President	301-322-2233	240-381-5201
Kishor Parikh	Chemist	301-322-2233	301-906-3785

All 24 Hour Emergency Contacts

Emergency Response Information

FIRE/POLICE/EMS	911
P.G. County Fire Department	301-883-7182
State Emergency Response Commission	410-631-3000
National Response Center	800-424-8802
E.P.A. - Region IV, Title III Unit	404-347-1033
Chemtrec	800-424-9300
WSSC Water	301-206-8594
Maryland OSH	410-333-4197
Spill Response; Tri-County	800-746-4850
MISS Utility	800-257-7777

Registration

I.D. # - MDD985386143
S.I.C. - 3471
N.A.I.C.S. - 332813

Purpose

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ATTACHMENT:

**Attachment D – Emergency Response Information from Mr. Troy Mason on July 21, 2011.
F006 for FY2010.**

Attachment D

**Mid-Atlantic Finishing Corp.
July 20, 2011**

I. Emergency Response Information

A. Manufacturing Address

4656 Addison Road
Capitol Heights, MD 20743

B. Facility Telephone Numbers

1. Main: 301-322-2233
2. Fax: 301-773-5841

C. Registration

1. I.D. # - MDD985386143
2. I.C. - 3471 N.A.I.C.S. - 332813

D. M.A.F. Emergency Contacts (Internal)

<u>Name</u>	<u>Cell Telephone Number</u>
1. John O'Brien	301-538-0758
2. Jim McCormick	301-919-0573
3. Troy Mason	301-385-2469
4. BJ Mason	240-381-5201
5. Kishor Parikh	301-906-3785

E. Emergency Contacts (External)

1. Fire, Police, Paramedics	911
2. Prince Georges Fire Department	301-883-7182
3. State Emergency Response Commission	410-631-3000
4. National Response Center	800-424-8802
5. E.P.A., Region IV, Title III Unit	404-347-1033
6. Chemtrec	800-424-9300
7. WSSC Water	301-206-8594
8. MD. O.S.H.	410-333-4197
9. Spill Response: Tri-County Ind.	1-800-746-4850
10. Miss Utility	1-800-257-7777

ATTACHMENT:

Attachment E – MAF “Sludge Bag Weekly Inspection Log – Received from Mr. Troy Mason on 7/21/11.

Attachment E

**Mid-Atlantic Finishing Corp.
July 20, 2011**



EPA Inspection follow up

BJ Mason

to:

Debbie Moody

07/20/2011 04:05 PM

Cc:

"John Obrien", "Kishor Parikh", "Troy Mason "

Hide Details

From: "BJ Mason" <bj@maf.com>

To: Debbie Moody/R3/USEPA/US@EPA

Cc: "John Obrien" <john@maf.com>, "Kishor Parikh" <Kishor@maf.com>, "Troy Mason " <troy@maf.com>

2 Attachments



image002.jpg Sludge Bag Inspection Log

Hi Debra:

Attached see the Inspection log started today. We will do this weekly.

B.J.



BJ Mason, President
Mid-Atlantic Finishing Corp
301-322-2233 ext 203
Cell-240-381-5201
<http://www.maf.com>

(

[illegible]

FY 2004 EPA MANUAL INSPECTION CONCLUSION DATA SHEET (ICDS) FORM
Instructions and Definitions for Completing the Information Follow

1. Region: 3 Facility Name/Location: M.D. ATLANTIC Finishing Corp.
2. General Facility Permit ID or Media-Specific Permit ID number (e.g. NPDES permit #):
MD09853861435
3. SIC (4-digit) ☐ ☐ ☐ ☐ OR NAICS Code (5-digit): ☐ ☐ ☐ ☐ ☐
4. Date of Inspection: 7/20/11 (mm/dd/yyyy)
5. Media Type (check one only)
CAA-Stationary ☐ CWA-NPDES ☐ GLP ☐ TSCA Lead Paint ☐ CAA 112r ☐
CAA-Mobile Sources ☐ RCRA ☒ UST ☐ TSCA core, PCBs, asbestos ☐
6. Deficiencies: Did you observe deficiencies during inspection? ☒ Yes ☐ No [N/A is not allowed]
a. If YES, go to #7
b. If NO, go to #9
7. If YES: Did you communicate the deficiencies to the facility during the inspection? ☒ Yes ☐ No
8. Actions Taken: Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated? ☐ Yes ☒ No [N/A is not allowed]
a. If NO, go to #9
b. If YES, check the action(s) taken, or describe any other actions taken. (Check all that apply)

Action(s) taken

- ☐ Verified compliance with previously issued enforcement action -part or all conditions
☐ Corrected recordkeeping deficiencies
☐ Corrected monitoring deficiencies
☐ Completed a notification or a report
☐ Requested a permit application
☐ Implemented new or improved management practices or procedures
☐ Improved pollutant identification (e.g., labeling, manifesting, storage, etc.)
☐ Reduced pollution (e.g., use reduction, industrial process change, emissions or discharge change, etc.). *Specify the pollutant(s) reduced only if this action is checked.*

Water: Ammonia ☐ BOD ☐ COD ☐ TSS ☐ O/G ☐ TC ☐ DO ☐ Metals ☐ CN ☐

Air: NOx ☐ SO2 ☐ PM ☐ VOC ☐ Metals ☐ HAPs ☐ CO ☐

List other actions observed or other pollutants reduced: _____

9. Assistance: Did you provide general assistance based on national policy? Yes ☐ No ☒
Did you provide site-specific assistance based on national policy? ☐ Yes ☒ No
Note: EPA inspectors are not required to provide compliance assistance.

Optional Information: Describe actions taken or assistance provided to assist the facility.

RCRAINFO CM&E EVALUATION - VIOLATION FORM

*EPA ID Number		MDD9853861435			
Handler Name		Mid-Atlantic Finishing Corp.			
Street		4656 ADDISON ROAD			
City	CAPITOL HEIGHTS	State	MD	Zip Code	20743
*EVALUATION		<input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).	
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization
	CEI	07/20/11	E	R3/DEM	
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.			Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.		
Notes:					

Evaluation Indicator Field (Check all that apply)			
<input type="checkbox"/> Citizen Complaint	<input type="checkbox"/> Multimedia Inspection	<input type="checkbox"/> Sampling	<input checked="" type="checkbox"/> Not Subtitle C
Focused Coverage Areas (Use Only for Evaluation Type FCI)			
Regulation-Specific FCI			
BIF <input type="checkbox"/>	CCI <input type="checkbox"/>	CFI <input type="checkbox"/>	INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/>
THI <input type="checkbox"/>	UIC <input type="checkbox"/>	UOI <input type="checkbox"/>	UWR <input type="checkbox"/> OTHER (specify): _____
Routine/Standardized FCI			
CAR <input type="checkbox"/>	CPC <input type="checkbox"/>	DOS <input type="checkbox"/>	EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>

Does this Evaluation Add/Delete/Update a Violation?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in the Violations Section(s) on page 2 of this form.
Does this Evaluation have Undetermined Violations?	YES <input type="checkbox"/> NO <input type="checkbox"/>	
Does this Evaluation link to a Commitment?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, please use the RCRAinfo 3007 Information Requests and Commitments Form.
Does this Evaluation link to a 3007 Request?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, please use the RCRAinfo 3007 Information Requests and Commitments Form.
Was this Evaluation completed at a Federal Facility? (RCRA Section 6002)	YES <input type="checkbox"/> NO <input type="checkbox"/>	If YES, the Federal Facility Section (on reverse side of this form) must be completed. Only applicable to EPA Owned Inspections (Responsible Agency = E) at Federal Facilities

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES ☐ NO ☐ If Yes, fill in information below.

Seq. No.	Agency	Type	Date Determined (mm/dd/yyyy)	Seq. No.	Agency	Type	Date Determined (mm/dd/yyyy)

*Required Fields

EPA ID Number <u>MDD9853861435</u>	Handler Name <u>Mid-Atlantic Finish</u>
---	--

VIOLATIONS SECTION					
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<u>262.4</u>	<u>E</u>	<u>07/20/11</u>	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
Notes: <u>ONE bag OF FOUL waste NOT DATED</u>					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type		Citation			
<u>FR</u>		<u>40 CFR 262.34(a)(2)</u>			
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>		<div style="border: 1px solid black; height: 20px; width: 100%;"></div>			

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<u>262.C</u>	<u>E</u>	<u>07/20/11</u>	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
Notes: <u>ONE bag OF FOUL waste NOT labeled</u>					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type		Citation			
<u>FR</u>		<u>40 CFR 262.34(a)(3)</u>			
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>		<div style="border: 1px solid black; height: 20px; width: 100%;"></div>			

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<u>265.I</u>	<u>E</u>	<u>07/20/11</u>	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
Notes: <u>ONE bag OF FOUL waste NOT closed</u>					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type		Citation			
<u>FR</u>		<u>40 CFR 265.173 (a)</u>			
<div style="border: 1px solid black; height: 20px; width: 100%;"></div>		<div style="border: 1px solid black; height: 20px; width: 100%;"></div>			

FEDERAL FACILITY SECTION (Fill out if EPA Owned Inspection at Federal Facility)		
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	RCRA 6002 inspection performed?
YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	Site given RCRA 6002 questionnaire?
YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Inspector questionnaire completed and mailed?

*Required Fields

EPA ID Number				Handler Name	
M DD985386 1435				Mid Atlantic Finishing	
VIOLATIONS SECTION					
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	264.B	E	07/20/11	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	
Notes: <u>NO Job Description or Job Responsibilities</u>					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type		Citation		Citation	
264.B		40 CFR 264.16(d)(1)			
FR					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	262.A	E	07/20/11	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	
Notes: <u>Fluorescent light bulbs was being thrown in the trash</u>					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type		Citation		Citation	
FR		40 CFR 262.11			
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
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*Required Fields

Recommend Follow-up -
IF ENF. RES Penalties have
Hesit

Mid-Atlantic Finishing Corp. Inspection

July 20, 2011

Based on the Inspection conducted on July 20, 2011, the following areas of concerns were noted:

Area of Concerns – State Violations:

- Facility did not have a Contingency Plan on site (**State Violation**);
- No weekly inspection or log records for Hazardous Waste storage area (**State Violation**).
- Storing Hazardous Waste greater than 90 days (**State violation**).

Area of Concerns – Violations:

1. Hazardous Waste Storage Area – One bag of F006 Hazardous Waste undated.
 - Failure to date hazardous waste container in accordance with **40 CFR 262.34(a)(2)**.
2. Hazardous Waste Storage Area – One bag of F006 Hazardous Waste not labeled.
 - Failure to label hazardous waste container in accordance with **40 CFR 262.34(a)(3)**.
3. Hazardous Waste Storage Area – One bag of F006 Hazardous Waste container not closed.
 - Failure to close hazardous waste container in accordance with **40 CFR 265.173(a)**.
4. No job description or job responsibilities.
 - Failure to provide description and job responsibilities for employees who handle hazardous waste in accordance with **40 CFR 264.16 (d)(1)**.
5. Florescent light bulbs were being thrown in the trash.
 - Failure to make an **hazardous waste determination** in accordance with **40 CFR 262.11**

"SUPER SACK" base of sludge
1000 GIL (SW MD)

MEET SQ6 STAG TEL EPA
Sack have been there. Please inspect +
side 11 Area!!!
Base of MDE "LQG"
+ INCONSISTENT on
STATE inspection